

In the Drawings:

Please approve the drawing changes as shown in red on the attached Marked-Up Annotated copies of Figures 15 and 23-26. Also enclosed are a set of Replacement Sheets for Figures 15 and 23-26, which include the same drawing changes as in the Annotated Marked-Up Drawing Sheets.

## REMARKS

As a preliminary matter, Applicant has amended the Specification and/or the Drawings to correct for the informalities and reference number inconsistencies noted by the Examiner. Additionally, Applicant has also added the legend “Prior Art” to Figures 23-26. Accordingly, withdrawal of the objections to the Specification and Drawings is respectfully requested.

Claim 6 stands rejected under 35 U.S.C. §102(b) as being anticipated by United States Patent Application Publication No. 2002/0159002 to Chang. Applicant respectfully traverses this rejection.

Applicant respectfully submits that the Chang reference fails to disclose all of the features of the present invention. More specifically, the Chang reference fails to disclose a surface lighting device that includes, *inter alia*, light-emitting element groups having three light emitting elements that are arranged to be contiguous with vertexes of a triangle, where the groups are arranged to be deviated every other column or row such that a positional relation among the light emitting element groups is a delta shape (i.e., triangular shape).

One example of an embodiment of the present invention that includes the claimed configuration of light-emitting elements and light-emitting element groups is shown in Applicant’s Figure 17. As can be seen in this figure, three light-emitting elements (7, 8, 9) are arranged in each light-emitting element group to be contiguous with vertexes of a triangle. Further, the positional relationship among the light-emitting groups is a delta shape (as shown by the dotted lines designated as “ $\Delta$  arrangement”).

In contrast, the devices of the Chang reference lack the claimed light-emitting element groups that are arranged in a delta shape. Although Figure 3 of the Chang reference does show a light-emitting element group of three light-emitting elements arranged as a triangle, the Chang reference fails to disclose the claimed delta-shaped positional relationship among a plurality of light-emitting element groups. Accordingly, as all of the features of independent Claim 6 are not disclosed in the Chang reference, Applicants respectfully request the withdrawal of this §1029b) rejection of Claim 6 under Chang.

Claims 1, 2 and 8 stand rejected under 35 U.S.C. §103 as being unpatentable over Applicant's Admitted Prior Art Figures 25 and 26 in view of United States Patent No. 6,236,382 to Kawakami et al. Applicant respectfully traverses this rejection. (Applicant notes that the Examiner listed the incorrect U.S. Patent Number for the Kawakami et al. reference in this rejection.)

Applicant respectfully submits that all of the claimed features are not disclosed or suggested in the cited references. In particular, neither Prior Art Figures 25 and 26 nor the Kawakami et al. reference disclose or suggest a surface lighting device that includes, *inter alia*, a reflection plate in which “non-light-emitting portions of the light emitting elements are covered by the reflection plate, with the reflection plate being positioned between the non-light-emitting portions of the light emitting elements and the diffusion plate” as defined in amended independent Claim 1. Similarly, amended independent Claim 2 defines a second reflection plate in which “non-light-emitting portions of the light emitting elements are covered by the second reflection plate, with the second reflection plate being positioned

between the non-light-emitting portions of the light emitting elements and the diffusion plate.”

One example of such a reflection plate in which the non-light-emitting portions of the light emitting elements are covered by the reflection plate is shown in Applicant’s Figures 1 and 3. As can be seen in Figures 1 and 3, reflection plate 2 covers the non-light-emitting portions of the light emitting elements 3, and the reflection plate is between the non-light-emitting portions of the light emitting elements 3 and the diffusion plate 1.

As correctly acknowledged by the Examiner, Prior Art Figures 25 and 26 fail to show that the non-light-emitting portions of the light emitting elements are covered by the reflection plate. Accordingly, the Examiner relied upon the Kawakami et al. reference for this feature.

However, Applicant respectfully submits that the Kawakami et al. reference also fails to disclose or suggest a reflection plate that covers the non-light-emitting portions of the light emitting elements, with the reflection plate being positioned between the non-light-emitting portions of the light emitting elements and the diffusion plate. As can be seen in Figure 5B of the Kawakami et al. reference, reflection wall 207a, which the Examiner equated with the claimed reflection plate, is located *below* the light emitting elements 200G, 200R and 200B. Accordingly, it cannot be considered as *covering* the light emitting elements. Further, reflection wall 207a of Kawakami et al. is not positioned between any portion of the light emitting elements (200G, 200R, 200G) and lens 3, which is the only element of Kawakami et al. that can even remotely be considered as being equivalent to the

diffusion plate of the claimed invention. Accordingly, as all of the features of amended independent Claim 1 are not disclosed or suggested in the cited reference, Applicant respectfully requests the withdrawal of this §103 rejection of independent Claim 1 and associated dependent Claim 8. For similar reasons, the rejection of amended independent Claim 2 is also believed to have been overcome.

Claims 3-5 and 7 stand rejected under 35 U.S.C. §103 as being unpatentable over Applicant's Admitted Prior Art Figures 25 and 26 in view of United States Patent No. 6,236,382 to Kawakami et al. and further in view of United States Patent No. 6,330,111 to Myers. Applicant respectfully traverses this rejection.

Applicant respectfully submits that one of ordinary skill in the art would not have been motivated to combine the teachings of Kawakami et al. and/or Myers with Applicant's Prior Art Figures 25 and 26 because neither Kawakami et al. nor Myers relates to a liquid crystal display (LCD) device, while Figures 25 and 26 both relate to liquid crystal display (LCD) devices. Instead of being directed to a liquid crystal display (LCD) device, the Kawakami et al. reference and the Myers are related to an LED display device. Accordingly, since an LED display device is different from an LCD device, Applicant respectfully submits that one of ordinary skill in the art would not have been motivated to modify Prior Art Figures 25 and 26 in light of Kawakami et al. and Myers in the manner suggested by the Examiner. Accordingly, for at least this reason, Applicant respectfully requests the withdrawal of this §103 rejection of Claims 3-5 and 7.

Further, with regard to independent Claim 3, Applicant also respectfully requests the withdrawal of this rejection because the cited references fail to disclose or suggest all of the claimed features. More specifically, the cited references fail to disclose or suggest a surface lighting device that includes, *inter alia*, linear light sources that are each “arranged on only one of a slope or side of the linear projected portions.”

One example of an embodiment of the invention defined by Claim 3 is shown in Applicant’s Figure 7. As can be seen in the upper portion of Figure 7, the substrate 4 includes three linear projected portions arranged at a fixed interval, with linear light sources 3 located upon the linear projected portions. Further, Figure 7 shows that “each of the linear light sources is arranged on only one of a slope or side of the linear projected portions,” as defined in amended independent Claim 3.


In contrast, the Myers reference lacks such an arrangement of the linear light sources. Initially, light sources 2 of Meyers are arranged on microprism sheet 1, and not on a substrate, as defined in Claim 3. Further, even assuming *arguendo* that microprism sheet 1 can be considered as equivalent to the claimed substrate, Figure 2A of the Meyers still fails to include the following feature of Claim 3: “wherein each of the linear light sources is arranged on only one of a slope or side of the linear projected portions.” In contrast, as can be seen in Figures 1 and 2A of Meyers, and as described in column 5 (lines 9-10) of Meyers, each of the light sources 2 is arranged to fit within one of the grooves 4. Thus, each light source 2 is arranged on both slopes or sides of the linear projected portions, instead of being arranged on only one of the slopes or sides, as defined in Claim 3. Accordingly, for this reason also,

Applicant respectfully requests the withdrawal of this §103 rejection of amended independent Claim 3.

For all of the above reasons, Applicant requests reconsideration and allowance of the claimed invention. Should the Examiner be of the opinion that a telephone conference would aid in the prosecution of the application, or that outstanding issues exist, the Examiner is invited to contact the undersigned.

Respectfully submitted,

GREER, BURNS & CRAIN, LTD.

By   
James K. Folker  
Registration No. 37,538

December 9, 2005

Suite 2500  
300 South Wacker Drive  
Chicago, Illinois 60606  
(312) 360-0080

Customer No. 24978

P:\DOCS\1324\70182\9R7945.DOC



15/26

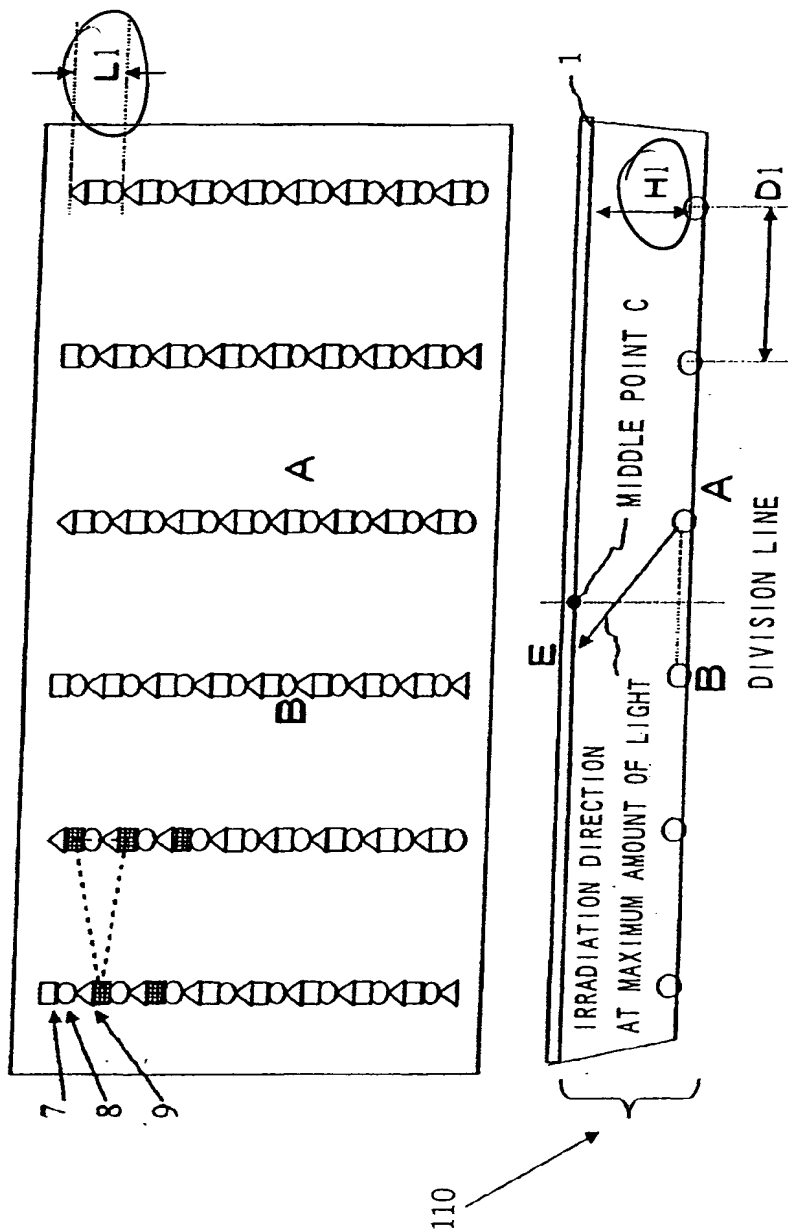


FIG.15



23/26

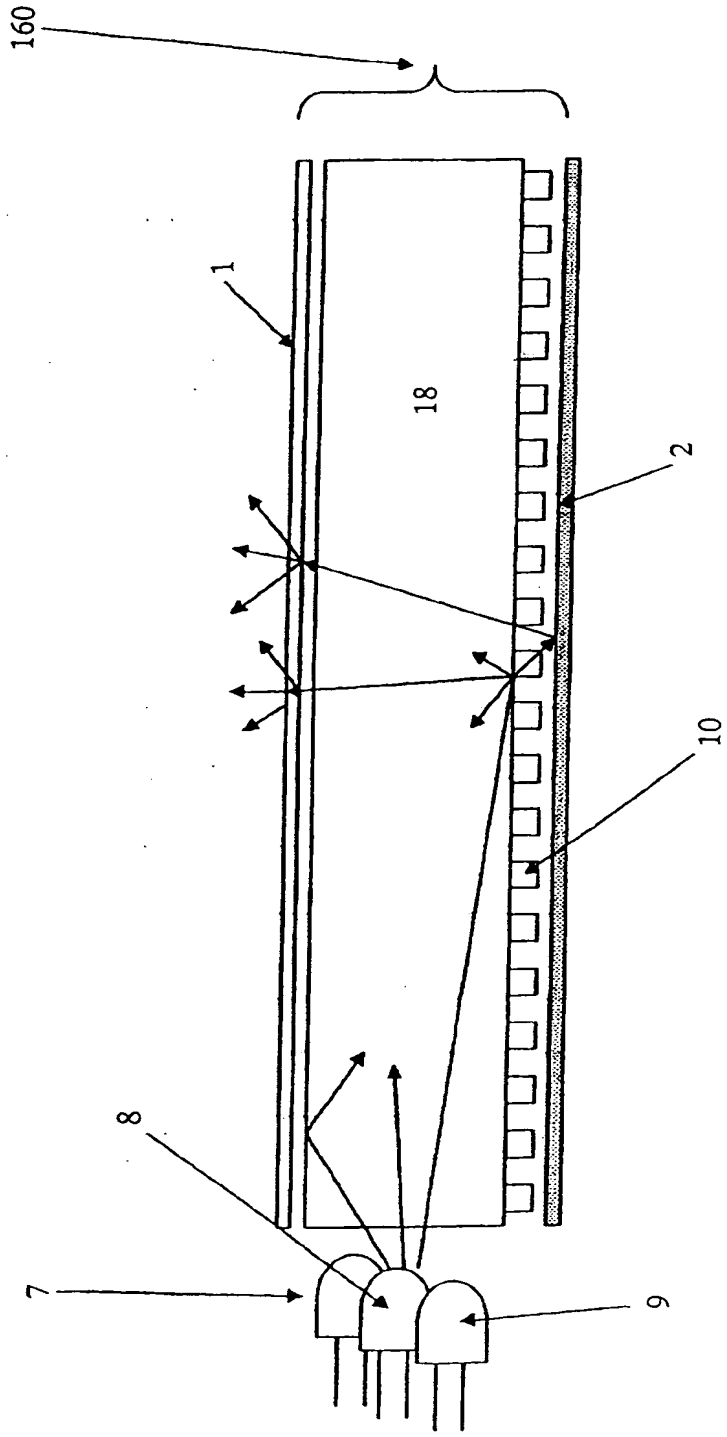
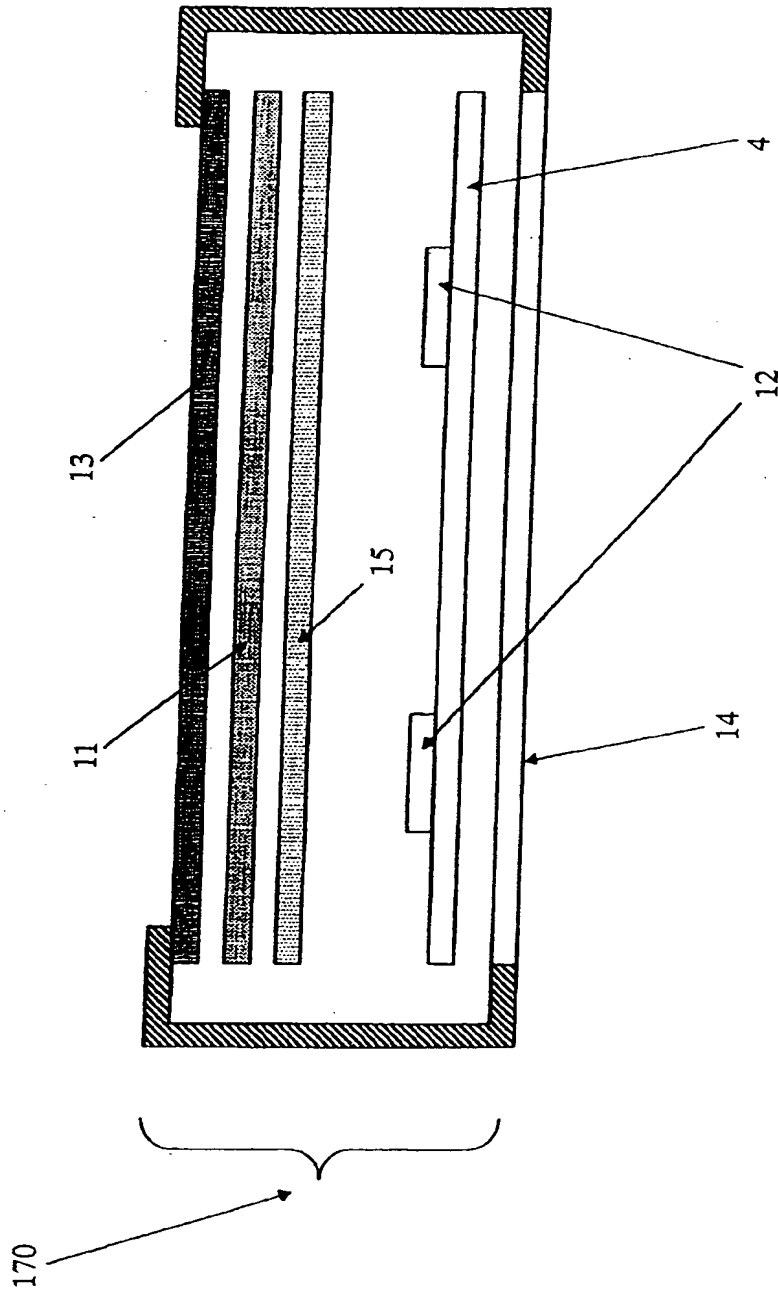


FIG. 23  
(PRIOR ART)

24/26



25/26

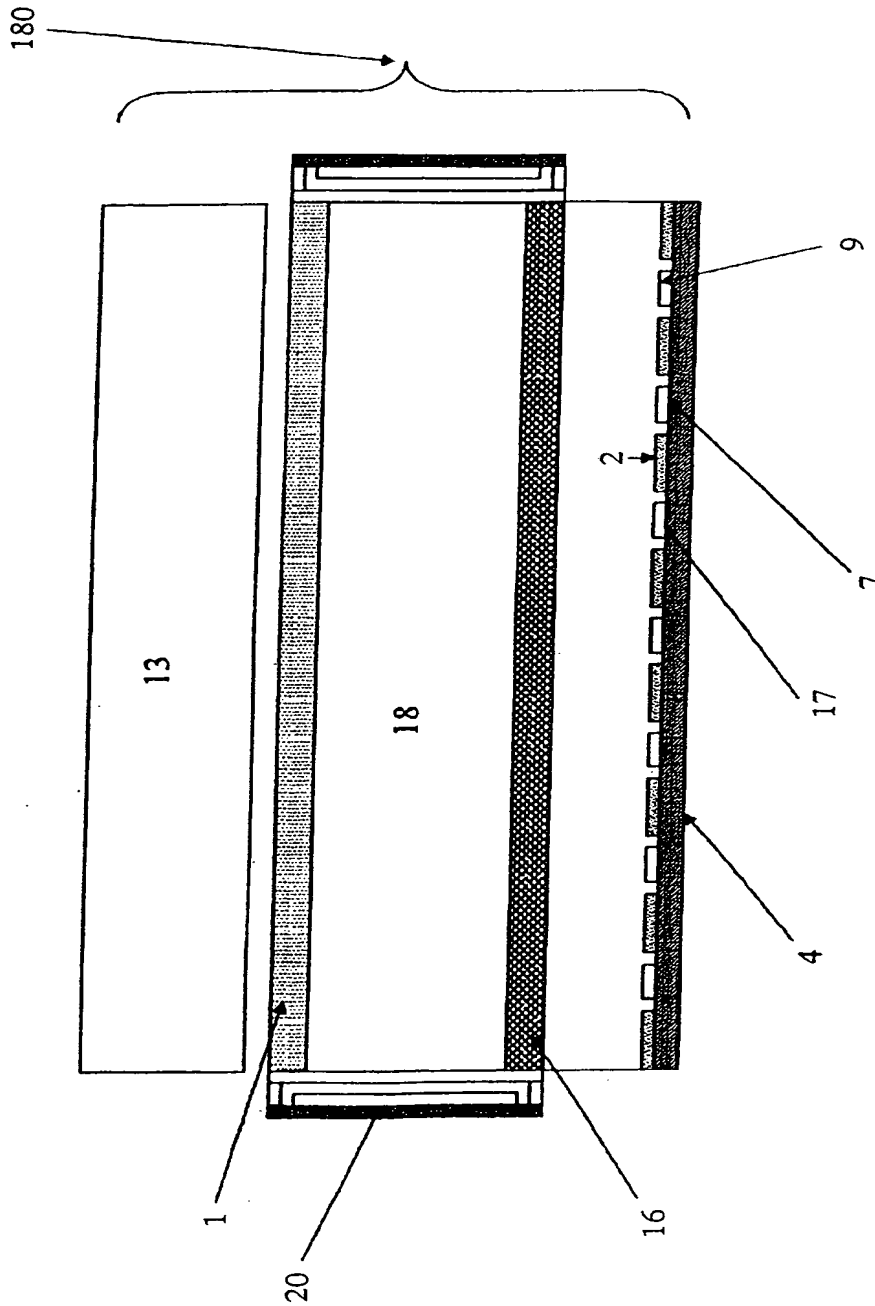


FIG. 25  
(PRIOR ART)

26/26

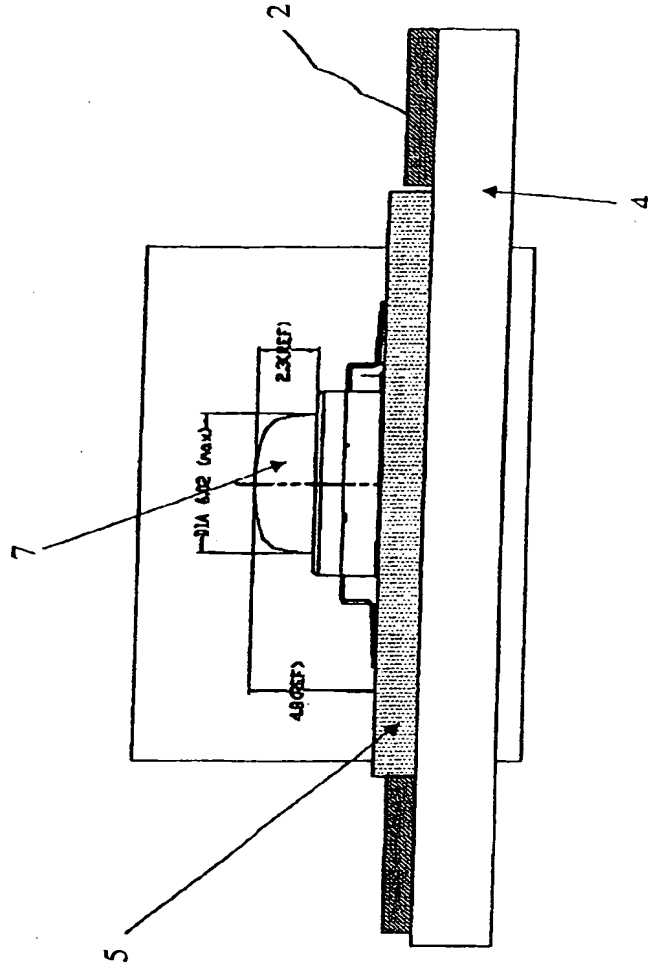


FIG. 26  
(PRIOR ART)